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Attorneys for Defendant  
FIDELITY NATIONAL TITLE INSURANCE COMPANY

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

WILMINGTON SAVINGS FUND  
SOCIETY, FSB DBA CHRISTIANA TRUST  
AS TRUSTEE FOR HLSS MORTGAGE  
MASTER TRUST FOR THE BENEFIT OF  
THE HOLDERS OF THE SERIES 2014-1  
CERTIFICATES ISSUED BY HLSS  
MORTGAGE MASTER TRUST

Plaintiff,

vs.

FIDELITY NATIONAL TITLE  
INSURANCE COMPANY,

Defendant.

Case No.: 2:19-cv-00959-JCM-VCF

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
FIDELITY NATIONAL TITLE  
INSURANCE COMPANY'S TIME TO  
RESPOND TO COMPLAINT**

**(First Request)**

Plaintiff Wilmington Savings Fund Society, FSB DBA Christiana Trust As Trustee for  
HLSS Mortgage Benefit of the Holders of the Series 2014-1 Certificates Issued by HLSS  
Mortgage Master Trust, ("Wilmington") and Defendant Fidelity National Title Insurance  
Company ("Fidelity"), by and through their counsel of record, hereby stipulate as follows:

**WHEREAS**, Wilmington filed its complaint in this matter on June 5, 2019 (ECF No. 1);

**WHEREAS**, Fidelity was served with the summons and complaint on or about September  
3, 2019;

**WHEREAS**, Fidelity's response to the complaint is due September 24, 2019;

**WHEREAS**, Wilmington has agreed to extend Fidelity's time to respond to the complaint  
to October 8, 2019; and



1           **WHEREAS**, this is the first stipulation for an extension of Fidelity's time to respond to  
2 the complaint.

3           Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate  
4 and agree as follows:

5           1. Fidelity shall file its response to the complaint on or before October 8, 2019.

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1 2. Fidelity intends to preserve its right and does not expressly waive any and all defenses  
2 listed in Fed. R. Civ. P. 12(b), including with respect to whether it is subject to  
3 personal jurisdiction in this forum.

4 Dated this 24th day of September 2019

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

/s/--Kevin S. Sinclair

By: \_\_\_\_\_  
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Attorneys for Fidelity National Title Insurance  
Company

11 Dated this 24th day of September 2019

WRIGHT, FINLAY & ZAK, LLP

/s/--Lindsay D. Robbins

By: \_\_\_\_\_  
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Nevada Bar No. 9524  
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Wilmington Savings Fund Society, FSB DBA  
Christiana Trust As Trustee for HLSS Mortgage  
Benefit of the Holders of the Series 2014-1 Certificates  
Issued by HLSS Mortgage Master Trust

**ORDER**

**IT IS SO ORDERED:**

By:  \_\_\_\_\_

Cam Ferenbach  
UNITED STATES MAGISTRATE JUDGE

September 25, 2019

Dated: \_\_\_\_\_